

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Selena Boston, Jalisa Rhodes,)	
Lutisha Martinez, and Lanette Washington,)	
)	CIVIL FILE ACTION NO.
Plaintiffs,)	1:23-CV-00752
v.)	
)	
Micah Sierra ‘Katt’ Williams, Tatiana)	
Smith and John Doe 1-15,)	
)	
Defendants.)	

**ATTORNEY LOLETHA DENISE HALE’S DECLARATION IN
SUPPORT OF RECUSAL OR DISQUALIFICATION
OF UNITED STATES DISTRICT JUDGE**

Personally appeared before the undersigned officer duly authorized to administer oaths, LOLETHA DENISE HALE, who, after being first duly sworn, states that the following facts are true and correct:

1.

I am Loletha Denise Hale, attorney of record for the plaintiffs in this civil action. I am more than 21 years old, and I am competent to testify.

2.

I have reasons to doubt and question whether United States District Judge William R. Ray II will impartially preside in this case and resolve pending motions.

I now believe that Judge Ray may have a personal bias or prejudice against me and my law firm, Hale Law Firm P.C., and in favor of the Defendant, and Defendant's legal counsel. I am concerned and afraid that Judge Ray's personal bias or prejudice may affect his ability to fairly preside as the judicial officer assigned to this case.

3.

My reasons to doubt the impartiality of Judge Ray include:

- a) At the August 27, 2025 summary judgment motion hearing, Judge Ray spoke to me in a disrespectful and condescending manner and questioned my honesty, candor and credibility in open court in the presence of opposing counsels and other courtroom spectators.
- b) Judge Ray stated he should have held a Rule 11 hearing during a prior civil matter where I testified, under oath, about a state court judge being removed (forced to retire) from the bench many years ago.
- c) Judge Ray made statements that supported the Defendant's claims regarding Defendant's request for admissions being deemed admitted by operation of law and advised opposing counsel to promptly submit their proposed order because plaintiffs had not yet filed a motion to withdraw admissions.

- d) Judge Ray also questioned me about whether or not I discussed the request for admissions issue with my clients [plaintiffs], thereby eliciting confidential communications and disregarding the attorney-client privilege.
- e) Judge Ray also indicated that he questioned my honesty, candor and credibility in explaining that I accidentally uploaded and e-filed the wrong version of plaintiff's brief in opposition to the defendant's motion for summary judgment on August 5, 2025. This draft of the brief was AI-generated by my daughter when she tried to assist me and labelled her draft with the same title as the correct version. [*Dkt.57*]
- f) I informed Judge Ray that I must have accidentally uploaded and filed the wrong brief while I was preoccupied because my best friend from law school was being eulogized on the same day. I filed the correct version of the plaintiff's brief in opposition to the defendant's motion for summary judgment on August 19, 2025, after being made aware of my error by Defendant's Reply brief filed on August 13, 2025 and prior to the August 27, 2025 hearing. [*Dkt. 60*]

- g) On September 8, 2025, Judge Ray *sua sponte* issued an Order to Show Cause why I “should not be sanctioned for violating Rule 11(b)(2)” by filing a brief created by generative artificial intelligence (AI) with inappropriate case citations. Judge Ray’s Order to Show Cause also scheduled a Rule 11 hearing on September 29, 2025.
- h) My error in filing the wrong brief was a mistake, not an intentional violation of Rule 11(b)(2). Judge Ray should recuse himself or be disqualified from presiding over this case and any Rule 11 hearing based on a reasonable perception that Judge Ray has a personal bias or prejudice against me.

Executed this 12th day of September 2025.

/s/LOLETHA DENISE HALE
LOLETHA DENISE HALE, ESQ.